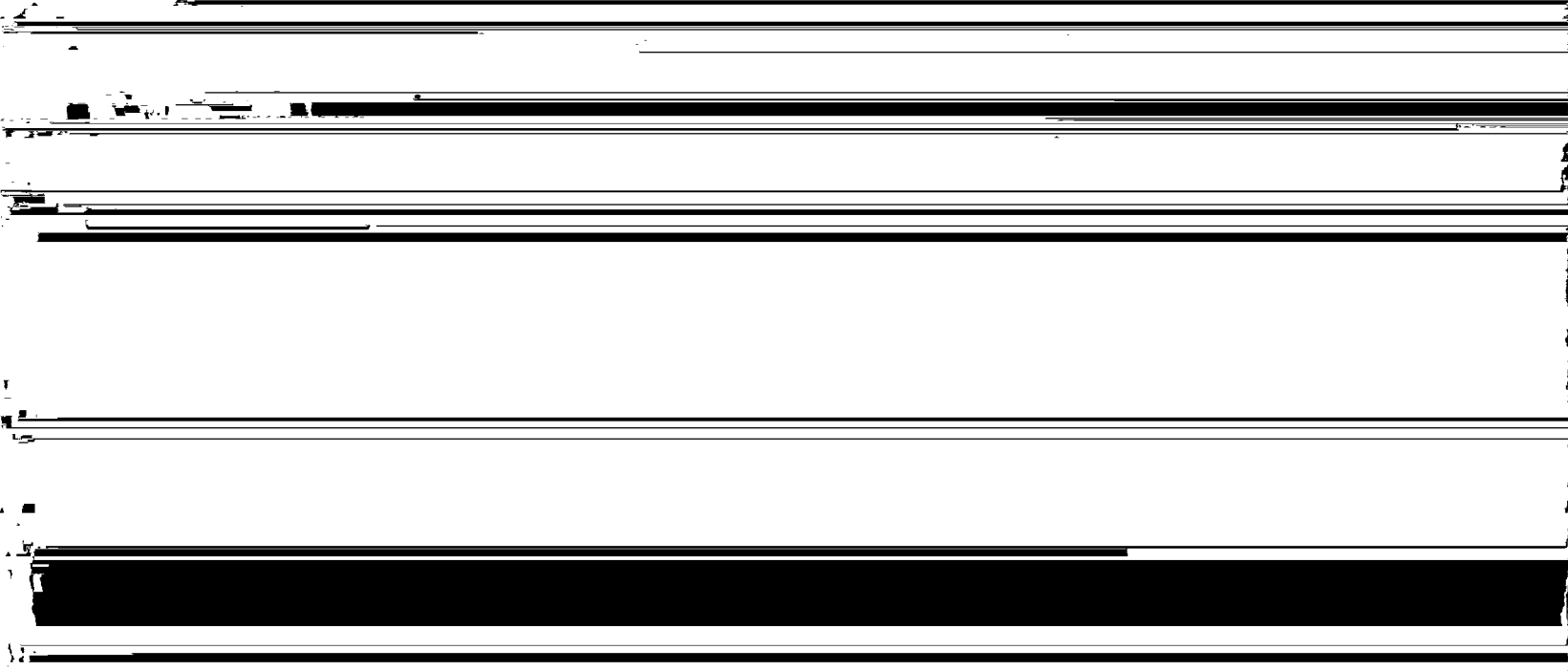




Spectrum Etiquette necessarily reflects numerous compromises and trade-offs. Northern Telecom believes that WINForum's efforts represent the best balancing of these competing interests. Northern Telecom therefore urges the Commission to adopt the WINForum Spectrum Etiquette, as refined in response to the initial comments, as a means of providing a framework for the rapid implementation of unlicensed PCS, which in turn will serve as a catalyst for the widescale deployment of PCS.

In its earlier pleadings in the Commission's PCS proceeding, Northern Telecom advocated an allocation of at least 35 MHz for unlicensed PCS.<sup>1/</sup> Northern Telecom continues to believe that there will be more than enough demand to justify such an allocation. Nonetheless, Northern Telecom believes that it is critical that unlicensed PCS not be delayed. Indeed, unlicensed PCS will be a critical element of our nation's information infrastructure, and a source of numerous, high quality jobs within the U.S.

In that light, if the Commission concludes that it can move ahead more rapidly with unlicensed PCS under its original



also now specifies "cross-over" methods. Northern Telecom therefore believes that the WINForum Spectrum Etiquette is superior to the Ericsson alternative, which includes only isochronous operations that are not well suited for data transmissions.

The data industry is large and robust -- data LANs and associated equipment are among the fastest growing segments of American industry. The avid user acceptance is based on an efficient asynchronous technology ideally suited to the specific characteristics and needs of intercomputer transfers. It is imperative that any set of rules governing the proposed unlicensed PCS band provide for systems that employ asynchronous

Northern Telecom believes that the WINForum Spectrum

Estimate requires only some minor refinement since Northern

Such interoperability will ensure a seamless transition between a PCS user's utilization of his or her equipment as they move among home, office and public areas.

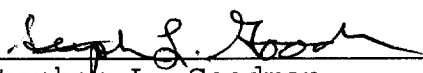
The WINForum Spectrum Etiquette will accommodate such interoperability, and thereby facilitate the deployment of equipment that can function in both licensed and unlicensed PCS environments.<sup>3/</sup> Northern Telecom recognizes that it will still be necessary for the manufacturers to develop the necessary detailed technical standards, protocols and hand-offs. Nevertheless, the WINForum Spectrum Etiquette is appropriately neutral, which will allow for those standards to be developed and implemented, thereby supporting the important goal of interoperability.

Finally, Northern Telecom wants to respond to the

Telecom and other manufacturers are presently willing to expend the significant resources to manufacture equipment compliant with that etiquette. Based on the extensive technical work Northern Telecom has already performed in-house (much of which was shared with WINTech), as well as the other technical contributions of WINForum members, Northern Telecom is confident that the WINForum Spectrum Etiquette will work. Finally, since this is an etiquette that will allow many standards to interface simultaneously, it would be impossible to test all of the combinations of systems. It is not necessary to put off Commission adoption of the etiquette while additional testing or modeling is performed, since such delays will needlessly defer the deployment of PCS.

In sum, Northern Telecom urges the Commission expeditiously to adopt the WINForum Spectrum Etiquette, which will speed the deployment of PCS and thereby further the public interest.

Respectfully submitted,  
Northern Telecom Inc.

  
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